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Attorney for Defendant
 VASILE MEREACRE

UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	CASE NO. CR-18-00348 LHK
)	
Plaintiff,)	STIPULATION PERMITTING
)	TELEPHONIC APPEARANCE OF
vs.)	DEFENDANT; (PROPOSED) ORDER
)	
VASILE MEREACRE, et. al.,)	
)	
Defendants.)	
_____)	

The parties hereto, Doron Weinberg appearing for Defendant Vasile Mereacre, and Assistant United States Attorney Susan Knight appearing for Plaintiff United States, hereby acknowledge a defendant's right to appear in person before the Court in any and all proceedings and, at the Court's discretion, to make the appearance telephonically.

The parties agree that as to this defendant, it is highly likely that the case will resolve but given the complexity of matters relating to any change of plea, further discussions are necessary.

On June 11, 2019, the Honorable Susan van Keulen granted the parties' stipulation to allow defendant Mereacre to travel to Toronto, Canada to visit with his family and obtain

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1 medical and dental treatment. ECF 35. Pretrial Services concurred with the trip. On July 8,
 2 2019, defendant Mereacre was unable to board his returning flight to Miami, Florida by United
 3 States Customs and Border Protection (“CBP”) because of the above-captioned criminal case.
 4 Defendant Mereacre promptly informed his Pretrial Services Officer in the Southern District of
 5 Florida. In order for defendant Mereacre to return to the United States, the Government must
 6 obtain a document from CBP known as a “Significant Benefit Parole.” On July 9, 2019, the
 7 Honorable Virginia K. DeMarchi approved the parties’ stipulation modifying defendant
 8 Mereacre’s pretrial release condition to allow him to remain in Toronto, Canada while the
 9 Government obtains the appropriate travel documents from CBP that allow defendant Mereacre
 10 to enter and remain in the United States. ECF 37. Defendant Mereacre is residing with his
 11 parents and reporting to Pretrial Services.

12 As the defendant resides in Canada and has previously complied with the requirements of
 13 appearing telephonically, it is agreed to request an order from the Court permitting the defendant
 14 to appear telephonically for the September 18th proceeding.

15 Dated: September 10, 2019

Respectfully submitted,

16 LAW OFFICES OF DORON WEINBERG

17 /s/ Doron Weinberg

18 DORON WEINBERG
 Attorney for Defendant
 VASILE MEREACRE

19 Dated: September 10, 2019

20 DAVID L. ANDERSON
 United States Attorney
 Northern District of California

22 By: /s/ Susan Knight

23 SUSAN KNIGHT
 Assistant United States Attorney
 Attorney for Plaintiff

25
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(PROPOSED) ORDER

Good cause appearing therefor, IT IS HEREBY ORDERED that defendant Mereacre's appearance for the status hearing now scheduled for September 18, 2019 may be made telephonically by way of court approved process.

Dated:

HONORABLE LUCY H. KOH
Judge, U.S. District Court

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